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ROY ROMER
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Interim Executive Director

February 10, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: *OU1* Technical Memorandum 5, Addendum to Final Ph III RFI/RI
Workplan

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and its prime operating contractor EG&G. We understand that a new version of this document will be prepared and submitted in the near future which will incorporate comments delivered at the January 28, 1992 meeting. Therefore, our comments will be brief:

1) The Division does not feel it is appropriate to limit the analyte list for metals to the six target metals chosen by the CDH Health Advisory Panel (HAP). The HAP has made their determination independently from DOE. In addition, their determination is based on site-wide data interpreted from only a human health perspective. We expect DOE and EG&G to use the vast amount of site-specific and site-wide data, as well as the data generated by this sampling program, to make their own determination of the metal contaminants of concern.

In addition, relative to metals in the surficial soils, the RFI/RI Workplan, to which this is an addenda, is tasked with determining the nature, extent, fate, and transport of all contaminants within OU 1. Section VII of the IAG Statement of Work discusses the items which must be included in the RFI/RI Report. The Division believes that to evaluate the surficial soils to the extent necessary to meet the RFI/RI Report requirements, a comprehensive TAL metals analysis may be needed.

2) It is unclear why the conceptual model presented in this document was different from the conceptual model developed for

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surficial soils in OU 3.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

A handwritten signature in cursive script that reads "Gary W. Baughman". The signature is written in dark ink and is positioned above the typed name.

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Scott Grace, DOE
Paul Bunge, EG&G
Dennis Smith, EG&G
Barbara Barry, RFPU